UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

CONSUMER FINANCIAL PROTECTION BUREAU, PLAINTIFF, V. 1ST ALLIANCE LENDING, LLC; JOHN CHRISTOPHER DIIORIO; AND KEVIN ROBERT ST. LAWRENCE, DEFENDANTS.	CASE NO.: 3:21-cv-00055-RNC January 25, 2024

PLAINTIFF'S EXHIBITS IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT AND STATEMENT OF UNDISPUTED MATERIAL FACTS[1]

Plaintiff Consumer Financial Protection Bureau (Bureau) respectfully submits and attaches hereto true and correct copies of the exhibits that the Bureau intends to cite in its Memorandum of Law in support of its Motion for Summary Judgment and its Local Rule 56(a)(1) Statement of Undisputed Material Facts, which will be filed with the Bureau's Motion for Summary Judgment on January 26, 2024.

[1] To aid in the review and consideration of the Bureau's forthcoming Motion for Summary Judgment and its Statement of Undisputed Material Facts, the supporting exhibits are being submitted in advance of these filings to permit the Bureau to include the precise docket number for each exhibit (and exhibit page) within the Bureau's citations.

PLAINTIFF'S EXHIBITS IN SUPPORT OF ITS MOTION FOR SUMMARY AND STATEMENT OF UNDISPUTED MATERIAL FACTS[2]

EX.	DESCRIPTION
1	Kevin St. Lawrence Resume
2	Nov. 20, 2018 – DiIorio Letter to Connecticut Department of Banking (CTDOB)) – Ex. 116
3	July 15, 2019 – CTDOB's Amended Notice of Intent to Revoke License
4	July 24, 2020 – 1st Alliance's Post-Hearing Brief, filed in CTDOB proceeding
5	April 16, 2021 – CTDOB's Findings of Fact, Conclusions of Law, and Order
6	Nov. 17, 2022 – 1st Alliance's Appeal Memo of Law (filed in Connecticut Superior Court)
7	April 19, 2023 – Memo of Decision - Superior Court of Connecticut Affirming CTDOB Also available at: *1st All. Lending LLC v. Dep't of Banking*, No. HHB-CV-21-6066325, 2023 WL 3071205 (Conn. Super. Ct. Apr. 19, 2023)
8	Transcript – Jason Verraneault – CTDOB Hearing Testimony, dated 12-17-2018
9	Transcript – CTDOB Hearing Testimony - Jason Verraneault, dated 11-14-2019
10	Transcript – Deposition - Jason Verraneault, dated 10-22- 2022
11	Transcript – Deposition - Kevin St. Lawrence, dated 11-29-2022
12	Transcript – Deposition - Rule 30(b)(6) of 1st Alliance - Witness John DiIorio, dated 12-01-2022
13	Transcript – Deposition - Socrates Aramburu, dated 10-28-2022
14	Transcript – Deposition - Heather Sanchez, dated 09-15-2022
15	Transcript – Deposition - Bartholomew, dated 09-22-2019
16	Transcript – CTDOB Hearing Testimony – Briana Massey, dated 11-22-19
17	Transcript – CTDOB Hearing Testimony – John DiIorio, dated 2-27-2020
18	NORA Submission of 1st Alliance, dated 05-29-2020
19	1st Alliance Answer to Amended Complaint
20	John DiIorio Answer to Amended Complaint
21	Kevin St. Lawrence Answer to Amended Complaint

[2] The "Ex." column contains the exhibit number assigned in connection with the Bureau's Motion for Summary Judgment. Where an "Ex." designation is within the "Description" column, this reflects the exhibit number given to the document when used in another proceeding (i.e., a deposition, CTDOB administrative proceeding, CTDOB filing, etc.).

EX.	DESCRIPTION
22	Socrates Aramburu Answer to Amended Complaint
23	1st Alliance's Responses to CFPB's Requests for Admission, dated 12-12-2022
24	Email – November 18, 2018 From DiIorio to Haar Re: Licensing Costs
25	2016 Draft 1st Alliance Audit Report – Ex. 82
26	1A Operational Risk Assessment (March 2014)
27	1A Internal Audit and Risk Assessment (June 2015)
28	Email – February 16, 2017 email attaching December 2016 Internal Audit and Risk Assessment of 1st Alliance – Ex. 81
29	2017 Internal 1A Audit, published February 1, 2018
30	May 28, 2021 – Administrative Appeal of 1st Alliance "Complaint" filed in Conn. Superior Court, initiating appeal seeking judicial review of CTDOB's April 16, 2021 decision
31	Email – 12-22-2016 From DiIorio copying St. Lawrence and others
32	Email – December 6, 2016 DiIorio to St. Lawrence re: "Our Future...Draft" – Ex. 113
33	Email – November 14, 2017 Verraneault to DiIorio, with attachments – Ex. 55
34	Purchase Inquiry Screen (Screenshot Exhibit)
35	HLC New Hire Training Binder
36	2Q 2017 New Hire Training – Ex. 90
37	Job Description – HLC, dated 1-1-2018 – Ex. 88
38	Email – December 19, 2017 email w-attachments – Ex. 56
39	1st Alliance Training Manual – Ex. 52
40	1A Training Materials – Professional Sales Process 2Q 2017
41	1A Training Materials – Professional Sales Process 2Q 2018
42	Minutes of September 11, 2018 1A Executive Meeting – Ex. 115
43	Email – March 23, 2017 St. Lawrence email – Ex. 92
44	Email – February 15, 2018 St. Lawrence email – Ex. 100
45	1A Home Loan Pre-Approval Application – Ex. 103
46	Email – October 11, 2017 Cole Fleeher Email with "Prequalification Application" Attachment – Ex. 104
47	Email – October 16, 2017 Massey To DiIorio with "Compliance Memo" Attachment – Ex. 118

EX.	DESCRIPTION
48	Email – May 29, 2018 Massey To DiIorio with "Training and Long Term Proposal" Attachment – Ex. 102
49	Minutes of April 27, 2016 1A Executive Minutes – Ex. 91
50	Email – April 6, 2017 Exchange Between Verraneult and St. Lawrence – Ex. 94
51	Email – January 9, 2018 DiIorio Email – Ex. 66
52	Email – April 4, 2018 DiIorio Email – Ex. 76
53	Email – April 5, 2018 Cale Ferland to DiIorio (forwarded to Aramburu) – Ex. 74
54	Email – December 17, 2018 From Nelson Smith To St. Lawrence Re: App Pull Through – Ex. 99
55	Email – July 5, 2019 letter from Sanchez to CTDOB – Ex. 37
56	May 29, 2019 1A Consumer ECOA Deficiency Notice – Ex. 38
57	1st Alliance Guidelines-HLA Reference – Ex. 85
58	HLA – MLO Employment Agreement
59	4Q 2017 1A Sales Training – Ex. 121
60	Email – April 19, 2016 Verraneult emails w-attachments Re: Duties – Ex. 86
61	Submission Coordinator Job Description – Ex. 87
62	Email – February 2, 2018 Email w-HLC Business Plans – Ex. 68
63	1A Production Flowchart – Ex. 57
64	CFPB Supplemental Interrogatory Responses, dated 6-14-2023
65	Email –May 1, 2018 DiIorio to Andrea Ward – Ex. 98
66	Email – DiIorio-Olson Email w-article attachment– Ex. 112
67	Undated DiIorio Letter Addressed to "all regulators of 1st Alliance"
68	Email – December 19, 2017 K. Ramos Email Re: Duties
69	Email – December 18, 2017 J. DiIorio Email Re: Duties
70	Email – December 19, 2017 J. DiIorio Email Re: Duties
71	Email – December 19, 2017 St. Lawrence Email Re: Duties
72	Email – October 26, 2017 DiIorio All Hands Email
73	1st Alliance Employment Agreement – Inquiry Specialist
74	1st Alliance Business Plan, dated March 10, 2017
75	Email – August 6, 2018 DiIorio to Aramburu and St. Lawrence
76	HLA Employment Agreement

EX.	DESCRIPTION
77	Minutes of November 15, 2016 Executive Meeting
78	HLC Ballinger Email w-PQ Attachment – Ex. 53
79	March 3, 2019 1A Update Re: TRID – Ex. 41
80	Email – August 30, 2017 SC-HLC Email w-Prequalified Letter
81	Email – September 7, 2017 SC-HLC Email w-Prequalified Letter
82	Email – September 15, 2017 SC-HLC Email w-Prequalified Letter
83	Email – January 3, 2017 SC-HLC Email w-PQ Attachment
84	Email – July 13, 2017 SC-HLC Email w-PQ Form Attachment
85	Email – June 15, 2017 SC-HLC Email w-PQ Form Attachment
86	Email – May 11, 2017 SC-HLC Email w-PQ Form Attachment
87	Email – May 18, 2017 SC-HLC Email w-PQ Form Attachment
88	Email – April 26, 2017 SC-HLC Email w-PQ Form Attachment
89	Email – June 27, 2017 Consumer Email To HLC
90	1A Employee List – Ex. 69
91	Transcript – CTDOB Hearing Testimony – January 8, 2020 Bartholomew
92	May 9, 2018 Better Business Bureau Complaint – Ex. 96
93	May 26, 2107 Consumer Complaint – Ex. 97
94	February 13, 2018 Executive Meeting Agenda.
95	August 25, 2017 HLC PQ Transmittal w-document requests
96	Requests for Admission – Responses of DiIorio, dated 12-12-2022
97	Email – August 2017 HLC email Re: Interest Rate
98	Email – May 10, 2018 HLC email Re: Terms
99	1st Alliance Responses to Requests from Texas regulators, dated 02-26 2014
100	Email – Consumer Complaint re: erroneous prequalification for loan, dated 05-9-2018
101	Various Positions' Job Duties SC-HLA-MLO
102	Email – September 14, 2017 HLC comment Re: Loan Estimate
103	Email – January 3, 2017 Re: 1A Gift Card Contest
104	Email – July 5, 2017 Re: HLC Application Contest
105	Email – November 2, 2017 Re: Prequalify Party
106	Email – February 6, 2018 Re: Application Contest

EX.	DESCRIPTION
107	John DiIorio Resume

Respectfully Submitted,

For Plaintiff Consumer Financial Protection Bureau

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2024 a copy of the foregoing pleading was filed utilizing the ECF system, which will send notice of this filing to all parties/counsel of record.

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